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workman's Comp Hearing was the Plaintiff's father and mechanic, Trevor ~~Beinfield~~. ~~Beinfield~~ worked steadily with Plaintiff throughout the 3½ day period at the Dalton School of Music and for weeks before that at 1120 Ave. of the Americas. Trevor ~~Beinfield~~ testified under oath that Plaintiff did NOT make repeated trips for materials as Harp previously testified to.

Also, Trevor ~~By~~field testified that Plaintiff was an excellent Apprentice and scoffed at Harp's suggestion. Harp also tried to cause harm to Plaintiff by testifying under oath "that Plaintiff can't work alone." Plaintiff was given a job ticket from Local Union # 3 to work for Commercial Electrical Contractors as a 5th year Helper and Plaintiff

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worked solely in that capacity
throughout his employment of never
missing a work day for Commercial
Electrical Contractor. As such, Plaintiff
never worked alone or, via
union protocol he is NOT
supposed to. Harap's last assertion
to Local Union #3, was perjury
in the 2nd degree, a class
D felony. Again Harap deliberately
set out to portray Plaintiff
in an untrue light to cause
harm to the Plaintiff.

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By reason of the facts and circumstances stated above, the defendant has conducted actions of 1) slander/ Libel / 2) Defamation of Plaintiff's character, 3) Intentional Infliction of Emotional Distress, 4) Emotional Pain and suffering, 5) Loss of services, 6) Conspiracy
All damages done to Plaintiff.

3) The defendant herein, ARTHUR LOWETH was employed by Commercial Electrical Contractors Inc. in the capacity of Super or Superintendent. He is a member of Local Union # 3 of the F.B.E.W. or such, he is

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fully aware of rules and protocol encompassing all facets of union contracting work, particularly safety.

At the Dalton School of Music, Loweth was the superintendent of the Project, - Edward Harap's immediate supervisor. On date, Nov. 16, 2006

Arthur Loweth signed a termination for cause or "bad layoff" to the Apprentice Dept. of Local Union #3 against Plaintiff,

Loweth's termination sheet is an exact replica as Harap's, dated

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7-7-06, stating "Non-productive, had to be told what to do over and over, told the super he (Plaintiff) is not a man to mess with." Loweth testified under oath at the Compensation hearing that he never witnessed the Plaintiff's work performance during Plaintiff's tenure under Foreman Eddie Harap. Yet Loweth took hearsay statements from Harap and signed to them without

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any evidence of such whatsoever.
Loweth also testified that
the Plaintiff threatened him
on 7-7-06 and that is the
reason Plaintiff was terminated.
Yet, Loweth signed off on
"un-productive" and "had to be
told what to do over and
over." Loweth has no corroboration,
whatsoever that Plaintiff threatened
him. He filed no police report.

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Plaintiff denies in full
ever threatening the Super
Arthur Loweth in any way
whatsoever. In fact, Plaintiff
asserts that Loweth, upon
coming on to the job site
about 9:30 A.M., that the
Super privately on the 3rd
Floor threatened the Plaintiff
"to not be in this industry."
Questions of safety and
injuries on that day sustained by

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the plaintiff where the
plaintiff left the job site in
an ambulance, went to Lenox
Hill Hospital Emergency Room and
was eventually unable to work
for 9 months, upset both
Harap and Loweth and they
both retaliated as a result
to conspire against Plaintiff.

Harap testified under oath that
Plaintiff DID inform him of
an injury to Plaintiff. Yet

Harap " did not give Plaintiff
an accident/incident report
because Arthur Loweth ordered
Harap not to. " This a
direct violation of both state
and Federal Law as well as
Union Protocol.

By reason of the facts
and circumstances stated above
Defendant- Arthur Loweth has done
to Plaintiff : 1) Defamation of character,
2) slander/Libel, 3) Intentional Infliction
of Emotional Distress, 4) Emotional Pain + suffering

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5) Loss of Services, 6) Conspiracy.

4) The defendant herein, both
Ciro Lupo and Steven London, /
Steven London / Steven Lunden
Are owner of Commercial
Electrical Contractors Inc., that
employed Plaintiff. They are also
owner of Laurelton Electric at
230-04 South Conduit Ave, Queens, not
affiliated with Local Union #3
of I. B. E. W, like Commercial Electrical
Contractors. on 7-7-06, while
Plaintiff was at Lenox Hill
Hospital, Ciro Lupo personally drove

to the headquarter of Local Union # 3 of I. B. E. W. and spoke to the Business Agents of Local Union #3, particularly John Deturro of the Grievance Department. Despite the age of Computer E-mails, fax machiner, the U.S. mail and countless courier companies, Ciro Lupo took it upon himself to hand deliver a multipage "Bad report statement" about Plaintiff with all the

baseless assertions via Edward Harap and Arthur Loweth. Lupo insisted on Plaintiff's inability to work alone, which is absolutely impossible as Plaintiff was hired as a 5th year Apprentice who never works alone via policy and protocol, unless put on an M.I.J. job, which never happened in the duration of Plaintiff's employment with Commercial Electrical Contractors Inc.

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Lupo also told Local 3 business agents that Plaintiff's wife "threatened legal action" when she called his company.

Plaintiff's wife denies this entirely, yet admits to speaking to Steve Lunden / Lunden / London who told her "he wanted Plaintiff out of the Electrical Industry." Ciro Lupo deliberately and willfully portrayed

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Plaintiff in a most unfavorable light to cause Plaintiff's career in jeopardy through false allegations or retaliation for Plaintiff's injuries and questioning of safety to the foreman, Edward Harap.

Ciro Lupo never witnessed any work performance of Plaintiff.

By the reason of the facts and circumstances stated above, Defendant Ciro Lupo has damaged Plaintiff through 1) Slander / Libel, 2) Defamation of Character, 3) Intentional Infliction of emotional distress, 4) Emotional

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Pain and suffering, 5) Loss of services,
6) Conspiracy. Also has Steven London/
London / London. #

5) The defendant herein,
COMMERCIAL ELECTRICAL CONTRACTORS,
INC. Being the corporation

Plaintiff was employed by on
7-7-06, and prior to that,

As a corporation, they
acted in concert to conspire
with defendants: Ed Harap (Individually)
Arthur Loweth (Individually) Ciro Lupo +
Steve London / London / London (Individually) —

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Deliberately and intentionally and through DIRECT MALICE to cause harm to Plaintiff through false statements, intimidation, coercion, manipulation, threats, endangering, etc. etc.

By reason of the facts and circumstances stated above, defendant Commercial Electrical Contractor, Inc. damaged Plaintiff through: 1) Slander/Libel, 2) Defamation of Plaintiff's character, 3) Intentional Infliction of Emotional Distress, 4) Emotional

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pain and suffering, 5) Loss of member,
6) Conspiracy.

WHEREFORE, Plaintiff seeks
judgment against all defendants for
both punitive and compensatory
damages in the sum of
\$860,000, plus interest from
July 7th 2006, costs and disbursements,
together with any other relief the
Court finds to be just and proper.

Dated: July, 2nd, 2007

John L. Peterec-Tolino-Pro Se
John L. Peterec-Tolino Pro
Plaintiff
14 straight Path Rock Hill N1
12775 - (917) 628-7300. X